

# Exhibit 8

# Kansas

# Exhibit 8A Meta's Proposal[s]

**MDL 3047 – 2024-12-20 Agency Discovery JLB**  
**Kansas – Meta Proposal**

**Search Terms:** Meta makes the following proposal for the (i) Board of Regents, (ii) Department for Aging and Disability Services, (iii) Department of Children and Family Services, (iv) Department of Administration, (v) Department of Commerce, (vi) Department of Education, (vii) Department of Health & Environment, and (viii) Governor's Office. At a high level, Meta's proposal involves using search combinations that require "Social Media Terms" or "Harm Terms" to occur "within 25" of one of the following "Youth Terms."

(teen\* OR tween\* OR adolescen\* OR kid\* OR youth\* OR minor\* OR young\* OR child\* OR underage\* OR "under-age" OR juvenile\* OR "pre-teen\*" OR preteen\* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen\* z" OR "gen-z" OR "gen\* alpha" OR gen-a\* OR scholar\* OR School\* OR student\* OR pupil\* OR grade\*)

#	<b>Social Media Terms</b>
1	"Youth Terms" <b>w/25</b> ("social media" OR "social network" OR Meta OR Facebook OR Instagram OR "Insta" OR Youtube OR Snapchat OR Snap OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR telegram OR signal OR viber OR threema OR wechat OR kik OR textplus OR wickr OR troop OR YikYak OR "Yik Yak" OR finsta OR FB OR IG OR YT OR TT OR DM*)
	<b>Harm Terms</b>
2	"Youth Terms" <b>w/25</b> (wellness OR wellbeing OR well-being OR confidence OR self-confidence OR "mental health" OR "TMH" OR "ACE*" OR "adverse childhood experience" OR anxi* OR anti-anxi* OR depress* OR antidepress* OR reclus* OR stress OR "attention deficit" OR "ADHD" OR posttraumatic OR "bi-polar" OR "bi polar" OR bipolar OR "BPD" OR insomnia OR lonel* OR therap* OR counsel* OR treatment*)
3	"Youth Terms" <b>w/25</b> ("pro-ana" OR "BMI" OR overweight OR fat OR obes* OR diet* OR anorexi* OR bulimi* OR orthorexi* OR appetite OR dysmorph* OR binge OR purge OR suicid* OR "self harm" OR "self-harm" OR selfharm OR unalive OR cutting*)
4	"Youth Terms" <b>w/25</b> (bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR hookup* OR solicit* OR pedophil* OR predator* OR sex* OR extort OR exploit*)
5	"Youth Terms" <b>w/25</b> (violen* OR abus* OR assault* OR fight* OR altercation OR misbehav* OR misconduct* OR shoot* OR shot OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR traff* OR hate*)

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6	“Youth Terms” <b>w/25</b> (addic* OR hook* OR dopamine OR rabbithol* OR spiral OR “social reward” OR “social approval” OR “screen time” OR screentime staytime OR timespent OR “time spent” OR “engagement” OR impression* OR “monthly active users” OR “daily active users” OR “monthly active people” OR “daily active people” OR “weekly active users” OR “mandatory break” OR “limiting tool” OR “habit loop” OR “operant conditioning” OR “impulse control”)
7	“Youth Terms” <b>w/25</b> (eat* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
8	“Youth Terms” <b>w/25</b> (sleep* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
9	“Youth Terms” <b>w/25</b> (negative w/3 (appearance OR experience OR affect* OR effect*))
10	“Youth Terms” <b>w/25</b> (compar* w/5 (appearance OR social OR other* OR negative))
11	“Youth Terms” <b>w/25</b> (body w/3 (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*))
12	“Youth Terms” <b>w/25</b> (self w/3 (esteem OR harm OR control OR injur* OR mutilat* OR regulat*))
13	“Youth Terms” <b>w/25</b> (Covid* OR coronavirus OR pandemic OR lockdown OR “lock* down” OR quarantine OR “social* distanc*”)
14	“Youth Terms” <b>w/25</b> (svap* OR “ecig” OR “e-cig” OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul)

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**Custodians:** Meta proposes that the above search terms be run on each agency's custodial documents (including email and other custodial data sources), and relevant non-custodial data sources, that cover the entire period from January 1, 2012 to April 1, 2024, which encompasses the same time period from which Plaintiffs seek discovery, and have plead as the "Relevant Time[]]" in Plaintiffs' Complaint. *See* ECF No. 969; MDL Compl. ¶ 19 (alleging a "Relevant Time[]]" that starts "no later than 2012").

Meta proposes that the search terms set forth above should be run against at least the custodians listed below. Custodians designated with an asterisk (\*) have been affirmatively proposed and agreed to by the Kansas AG's office during the course of the Parties' negotiations. To the extent the custodians below do not cover the relevant time period or all relevant topics for each agency, the State and/or agency should propose additional custodians to Meta, and Meta reserves the right to select additional custodians.

Agency	Custodian	Title
Board of Regents	Mistie Knox*	Director of Academic Affairs
Board of Regents	Matt Keith*	Communications Director
Dept. of Aging & Disability Services	Andrew Brown*	Deputy Secretary of Programs
Dept. of Aging & Disability Services	Cara Sloan-Ramos*	Director of Communications
Dept. of Aging & Disability Services	Leigh Keck*	Director of Governmental Affairs
Dept. of Aging & Disability Services	Gary Henault*	Director of Youth Services
Dept. of Aging & Disability Services	Linda Buchheister*	Child & Comm. Inpatient Program Mgr.
Dept. of Aging & Disability Services	Angie Brungardt*	MH Intervention Team
Dept. of Aging & Disability Services	Stephanie Rhinehart*	Prevention Program Mgr.
Dept. of Aging & Disability Services	Laura Brake*	Director of Crisis Svcs.

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<b>Agency</b>	<b>Custodian</b>	<b>Title</b>
Dept. of Aging & Disability Services	Andres Mata*	Youth Engagement Specialist
Dept. of Aging & Disability Services	Ashley Raletz*	Youth Program Coordinator
Dept. of Aging & Disability Services	Alex Zelkovitz*	State Suicide Prevention Coordinator
Dept. of Aging & Disability Services	Jessica Mays*	Assistive Outpatient Treatment Mgr.
Dept. of Aging & Disability Services	Destini Gillian*	Justice Involved Svcs. Coordinator
Dept. of Aging & Disability Services	Aneliese Apala-Flaherty*	988 Project Coordinator
Dept. of Aging & Disability Services	David Johnson*	Mobile Crisis Project Coordinator
Dept. for Children & Families	Danielle Davis*	Paralegal/Records Custodian
Dept. for Children & Families	David Arnold	Kansas City Regional Director
Dept. for Children & Families	Dee Nighswonger	Wichita Regional Director
Dept. for Children & Families	Caroline Hastings	Northeast Regional Director
Dept. for Children & Families	Pamela Beach	Northwest Regional Director
Dept. for Children & Families	Stacy Tweedy	Southwest Regional Director
Dept. for Children & Families	Anita Cooper	Southeast Regional Director
Dept. of Administration	Jennifer Flory*	Director of State Employee Health Plan

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<b>Agency</b>	<b>Custodian</b>	<b>Title</b>
Dept. of Administration	Pete Nagurny*	Senior Manager of Data and Finance in the State Employee Health Plan
Dept. of Commerce	Amber Cabrera*	Attorney
Dept. of Commerce	Jhon Ybarra	Regulatory Compliance Director
Dept. of Commerce	Mike Beene	Assistant Secretary of Commerce
Dept. of Commerce	Abby Works	Chief of Staff
Dept. of Education	Scott Gordon*	Counsel
Dept. of Education	Kent Reed*	Education Program Consultant
Dept. of Education	Jake Steel*	Director, Strategy and Operational Alignment
Dept. of Education	Randy Watson	Commissioner
Dept. of Education	Kelly Chanay	Director, Child Nutrition & Wellness Team
Dept. of Education	Brian Houghton	Co-Chair, Blue Ribbon Task Force on Student Screen Time
Dept. of Education	Melanie Haas	Kansas State Board of Education and Member of Blue Ribbon Task Force on Student Screen Time
Dept. of Health & Environment	Julie Sergeant*	Deputy Director, BHP
Dept. of Health & Environment	Mende Barnett*	Senior Director, Community Health Promotion Program
Dept. of Health & Environment	Daina Zolck*	Section Director - Injury & Violence Prevention Program
Dept. of Health & Environment	Philip Harris*	Deputy Director - Office of Communications
Dept. of Health & Environment	Jill Bronaugh*	Director - Office of Communications

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Agency	Custodian	Title
Dept. of Health & Environment	Ashley Goss	Public Health Division Chief, Deputy Secretary
Governor's Office	Will Lawrence*	Chief of Staff
Governor's Office	Ryan Wright*	Deputy Chief of Staff
Governor's Office	Kate Davis*	Director of Regulatory Affairs (no longer with the office)
Governor's Office	Josh McGinn*	Policy Director
Governor's Office	Tim Graham*	Director of Governmental Affairs
Governor's Office	Shelbie Konkel*	Senior Advisor for Federal & State Affairs
Governor's Office	Cory Sheedy*	Legislative Director and Assistant Counsel
Governor's Office	Sam Coleman*	Communications Director
Governor's Office	Lauren Fitzgerald*	Communications Director
Governor's Office	Brianna Johnson*	Communications Director
Governor's Office	Ana Nixon*	Communications Director
Governor's Office	Zach Fletcher*	Deputy Communications Director
Governor's Office	Dawn Knudtson*	Director of Finance & Office Development
Governor's Office	Libby Keogh*	Director of Constituent Services
Governor's Office	Ethan Belshe*	Senior Advisor for Federal & State Affairs